Alaska Rainforest Defenders

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Re: Vallenar Young Growth Project

Dear Ms. Howle:

Alaska Rainforest Defenders ("Defenders") submits the following comments on the Vallenar Young-growth Project. A DVD disks of exhibits is being mailed separately. For email correspondence, please use the address in the signature block.

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I. Introduction

The project would clearcut 4.6 million board feet (MMBF) of young-growth timber from 155 acres of recovering forest within a 284 acre project area in the Vallenar Creek watershed.[1] The recovering forest is 62 years old and consists mostly of Sitka spruce with some hemlock and red alder.[2]

The University of Alaska and Alaska Division of Forestry plan to clearcut 1,600 acres of old-growth forest and 300 acres of recovering forest on lands adjacent to the project area.[3] The three projects will occur simultaneously as part of coordinated planning and cost sharing between the three timber agencies. Cumulative clearcutting implemented through this joint effort would convert 2,065 acres of old-growth and maturing, recovering forest into early seral forest.[4] A fourth project, on the east side, the Alaska Mental Health Trust will clearcut 3,180 acres of land recently acquired pending finalization of a land exchange with the Forest Service.[5]

Defenders supports the no-action alternative and requests that further NEPA analysis evaluate the no-action alternative by including detailed discussion of the value of allowing recovering forest to recover. The status of Gravina Island's deer population is precarious and remaining deer do utilize the project area. The project area does provide some habitat value. Forest succession is an important consideration because of the long-term habitat deficit that will result from the actions on adjacent lands managed by other timber agencies.

The federal part of the project area will also involve some steep slope logging and rely on leave strips in riparian areas to mitigate impacts even though Forest Service staff discussions and past experiments with removing recovering forests show a probability that these leave strips will blow down and pose additional risks to fisheries and aquatic resources. Given the availability of other timber for the likely purchaser – timber exporter Alcan - it is important that the Forest Service consider reserving federal land in the Vallenar Valley for non-timber uses rather than conduct a costly experiment in order to "sweeten the pot" for Alcan.

II. NEPA Concerns: re-evaluate the purpose and need and scope of project

A. The stated Purpose and Need are inexplicable and a restated Purpose and Need should identify the larger, multi-agency timber sale

The stated purpose of the project is to manage for timber production and begin the transition to second growth by providing "an economically viable supply of young-growth timber to develop new markets, refine skills and acquire equipment necessary for a young-growth industry."[6] This purpose is at best unclear and at worst

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[1] Preliminary EA at 1.

[2] *Id.* at 7.

[3] *Id.* at 5, Table 1.

[4] PR 820_0046.

[5] Preliminary EA at 5, Table 1.

[6] Preliminary EA at 2. PR 820_0016 (Landwehr 2017).

disingenuous. What industry? As defined in the dictionary, an "industry" refers to "systematic labor especially for some useful purpose or the creation of something of value" or a "department or branch of a craft, art, business or manufacture; especially one that employs a large personnel or capital especially in manufacturing." [7]

Alcan purchases timber for export, and its Alaska representative, Eric Nichols, attends a lot of meetings of various timber agency advisory and advocacy groups. This activity is not "industry." Even if Alcan's raw log export business was somehow an "industry," Alcan has been purchasing and logging second growth on private timberlands in southeast Alaska for over a decade.[8] It has been using mechanized equipment – a feller-buncher - to replace loggers for the same period of time.[9]

The Preliminary EA however, assumes ground-based yarding and felling by chainsaw.[10] It is confusing why the Forest Service believes that "refine[d] skills" are necessary to log recovering forests. The Timber resource report indicates that there is an "experienced" workforce available in Ketchikan that would "have a positive effect on timber harvest economics."[11] Implicitly, the stated "learning" purpose in the Preliminary EA indicates that the existing older workforce lacks sufficient skill.

Even if this experienced workforce is imaginary, the LRMP FEIS record shows that overall, workers from areas other than southeast Alaska comprise a significant proportion of the natural resource-based work force, with nearly half of the timber related jobs in southeast Alaska held by non-residents.[12] In other words, reality TV show "Axe Men" from Oregon and Washington hired by Alcan would have extensive experience logging recovering forests.

Further, there appears to be no emerging workforce with interest in dangerous and difficult jobs the Forest Service envisions as the economic future for the region. The Southeast Conference reports a "graying" of the regional timber workforce and states that the "workforce is aging/in decline while the new workforce does not have the same work ethic or interest in physical work."[13] Or perhaps younger workers are seeking other jobs, a reflection of the Southeast Conference's recognition that "[l]ogging has become a socially unacceptably business to be in."[14] Further NEPA analysis should drop the "skills" stuff or provide a more thorough discussion of the "refine skills" need. The analysis should also explain why field training for loggers must occur in this project area at this time, given the large amount of recovering forest available to timber sale purchasers in other areas available for Eric Nichols and his corporation to "refine" skills.

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[7] www.merriam-webster.com/dictionary/industry

[8] Exh. TIM12 (D. Alaska 2013).

[9] *Id.*; PR 820_0016 (explaining the use of a feller-buncher).

[10] Preliminary EA at 11.

[11] PR 820_0820 at 1.

[12] 2016 LRMP FEIS Project Record File 769_05_000329 at 16-18, 22 (ADOL 2015).

[13] Southeast Conference. 2016. Southeast Alaska 2020 Economic Plan at 26.

[14] *Id*.

The marketing purpose is also odd because the established market for federal second-growth timber is China.[15] There is nothing in the record to suggest that Alcan would purchase processing equipment.[16] The record provides comments from timber sale planners and purchasers clearly showing that there is no domestic manufacturing or market for these logs.[17] The Preliminary EA assumes 100% export of young growth timber due to the high cost of logging in the region and "absence of young growth manufacturing infrastructure."[18] In sum, there is nothing in the record to suggest that this project will entail any new markets, equipment or skills.

Further NEPA analysis should clarify and state the actual purpose of this project - to coordinate a larger timber sale with other timber agencies, and the perceived need to "take[s] advantage of economic efficiencies association with currently planned timber sales (State of Alaska and University of Alaska) in close proximity." [19] As explained by the Division of Forestry, "[t]he timing and location of this Forest Service proposed timber sale aligns well with a proposed state timber sale in the adjacent unit of the Southeast State Forest."[20] The analysis of the no-action alternative further clarifies the purpose of this project by explaining that "[t]he opportunity to offer a timber sale that would take advantage of economic efficiencies of other sales would be missed."[21]

B. The EA and FONSI need to consider the effects of federal and non-federal projects together

The determination of a significant effect on the environment requires consideration of "context."[22] The context of a project is the scope of the agency's action, including affected interests.[23] The Preliminary EA limited the context of the action to 155 acres of federal land.[24] Based on this scale, it concluded that the action "would not pose significant short- or long-term effects" obviating the need to prepare an EIS.[25] Defenders submits that further NEPA analysis must re-evaluate the context of this project and the FONSI because of the coordinated planning effort with other timber agencies, dependence of this project on adjacent timber sales and potential use of the Good Neighbor Authority.

The Vallenar Project and adjacent timber agency activities are interdependent: they are "connected actions" under the NEPA regulations. "Actions are connected if they: ... (ii) [c]annot or will not proceed unless other actions are taken previously or

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[15] Exh. TIM 2, Ketchikan Daily News. 2017. Timber benefits.

[16] *Id.*

[17] PR 820_0050 (DOF scoping 6.17.17); PR 820_0187 (Society of American Foresters 2017).

[18] Preliminary EA at 11.

[19] *Id.* at 3.

[20] PR 820_0050 (DOF scoping comments, 6.17.17).

[21] Preliminary EA at 12.

[22] 40 C.F.R. § 1508.27.

[23] *National Parks & Conservation Ass'n v. Babbitt,* 241 F.3d 222, 731 (9th Cir. 2001).

[24] Preliminary EA at 17.

[25] *Id.*

simultaneously [or] (iii) [A]re interdependent parts of a larger action and depend on the larger action for their justification.[26]

On a broad scale, southeast Alaska's five timber agencies – the Forest Service, Alaska Division of Forestry, Alaska Mental Health Trust, Sealaska Corporation and University of Alaska plan to package timber sales as coordinated projects for Alcan or Viking Lumber. Federal funds finance this effort - under the Challenge Cost Share Agreement, the Forest Service funds timber inventories across multiple landownerships and provides vehicles and administrative infrastructure to other timber agencies.[27] Importantly, the Challenge Cost Share Agreement *funds planning activities for adjacent lands so that federal and non-federal timber can be combined into one single project*.[28]

Coordinated timber sales are essential to the Forest Service's ability to sell trees from recovering forests because of their lower economic value. The primary advocacy group that supports the removing recovering forests, the Tongass Transition Collaborative, identifies an "all lands approach." The Tongass Transition Collaborative states that increased logging of recovering forests requires timber agencies to coordinate sales and share infrastructure: *"no single landowner can provide for young growth industry on their own*."[29] Thus, coordinated planning is necessary to provide a long-term, continuous supply by tying together road systems and sharing infrastructure, and using the Good Neighbor Authority to coordinate offerings spatially and temporally.[30] The Forest Service and other timber agencies have also formed an "All Lands Group" to coordinate timber sales and they are now "true partners" in producing joint projects.[31]

The record shows that the Vallenar Young-growth Project is such a coordinated offering. The federal piece of the project relies on state timber road construction for access and for financial viability.[32] Alaska state forester Chris Maisch refers to the need to "coordinate future timber management activities on Gravina Island" and identifies the Vallenar project as a component of "our plans for joint projects on Gravina."[33]

Maisch is negotiating with the Forest Service on a Supplemental Project Agreement to administer the federal component of the larger coordinated effort under

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[26] 40 C.F.R. § 1508.25.

[27] Exh. TIM 3. Division of Forestry/U.S. Forest Service 2015. Challenge Cost Share Agreement.

[28] *Id.*; *see also* Exh. TIM 4 (showing that the Forest Service is funding long time state timber bureaucrat Clarence Clark to analyze and plan coordinated timber agency access).

[29] Exh. TIM9. Campen, S., D. Pornter & A. Thoms. 2016. Tongass Young Growth Forest Management.

[30] *Id.*

[31] Exh. TIM10 (Tongass Transition Collaborative. 2017).

[32] PR 820_0217 (explaining that the state road is essential for access to the project area); PR 820_0218 (stating that the state road subsidy is essential to reducing Alcan's road construction costs and would increase the advertised bid rate from $46.51 to $80.17).

[33] PR 820_0062 (Maisch e-mail10.11.17; PR 820_0050 (DOF scoping 6.7.17).

the Good Neighbor Authority.[34] The Forest Service anticipates delegating the project to the Alaska Division of Forestry who will sell federal timber under the Good Neighbor Authority.[35] The project record shows that IDT members recognize that "the OG harvest on state lands is part of this project."[36]

The University of Alaska timber sale received no bids but it is still available, making it clear that Alcan is awaiting final preparation of the larger, three-agency project in order to spread the costs association with mobilization.[37] The University of Alaska intends to rebid project based the understanding that Alcan would be working on the Division of Forestry/Forest Service project.[38]

The Preliminary EA acknowledges that the project "salability could improve if the timing of the Forest Service contract offer coincides with the sales on non-Federal lands" because the additional volume would help to offset mobilization and other costs.[39] The multi-agency timber project is not just about "improving" salability – *it is dependent on coordination with adjacent timber sales* particularly because of the low value of the federal component. Initial planning on the project made clear that "the increased volume in a cooperative sale would make it ... economically feasible."[40] Prospective purchaser Eric Nichols of Alcan informed the Forest Service that there must be "joint timing" between the federal, University of Alaska and State of Alaska offerings to bring the timber to market at the same time.[41]

Finally, Defenders submits that the proposed use of the Good Neighbor Authority for a project that is exclusively a timber sale, and the coordinated timber sale planning effort described above "may establish a precedent for future actions with significant effects or represent[] a decision in principle about a future consideration."[42] The FONSI fails to consider either the Good Neighbor Authority component or the joint planning component of this project. It erroneously concluded that the project would not set a precedent based on historical timber sale practices and by wrongly identifying the project as a "local action."[43] The Tongass Transition Collaborative's "All Lands Approach" adopted by the Forest Service clearly sets a precedent for future actions with significant effects by injecting federal funds into coordinated timber sales that will enable Alcan to combine clearcutting of federal recovering forests with the liquidation of adjacent old-growth forests managed by other timber agencies.

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[34] *Id.*; Exh. TIM4, Division of Forestry. 2017. Board of Forestry, Draft Meeting Minutes August 1, 2017.

[35] PR 820-0138.

[36] PR 820_0039.

[37] PR 820_0218 (Timber Resource Report).

[38] PR 820_0173.

[39] Preliminary EA at 12.

[40] PR 820_0209 (Briefing Paper 9.28.16).

[41] PR 820_0038 (adding that the opportunity came about because of the State of Alaska's willingness to subsidize Alcan by constructing a road which allows access to all 3 landownerships).

[42] 40 CFR § 1508.27(b)(6).

[43] Preliminary EA at 19.

In sum, the coordinated planning efforts and other input from other timber agencies and timber purchasers in the record show that the Vallenar Young-growth Project is an interdependent part of a larger action and cannot proceed in the absence of the combined state/University/federal project. The Preliminary EA improperly limited the context of the action solely to federal lands. Further NEPA analysis must consider the entire coordinated project and revisit the FONSI.

C. Further NEPA analysis must explain the Forest Service's rationale for the Good Neighbor Authority

The Preliminary EA does not disclose the proposed use of the Good Neighbor Authority despite clear indication from the record that the Division of Forestry and Forest Service are negotiating an agreement.[44] As an initial matter, the Forest Service should have certified the Vallenar Young Growth Project as a Good Neighbor project prior to preparing a NEPA analysis.[45] There is no indication in the record that the Forest Service followed this procedure at the time of project initiation or subsequent stages of the Forest Service's timber sale planning process.[46] If the Forest Service and Division of Forestry want to use this option, the parties should redo the Gate 1 analysis, and re-scope the project. Further NEPA analysis also needs to consider whether and to what extent the Good Neighbor Authority permits NFS road reconstruction.

Re-scoping is necessary to provide for public comment on appropriate project components that would be consistent with the intent of the Good Neighbor Authority. The statutory purpose is to coordinate watershed restoration projects and projects that may reduce hazardous fuels or address insect and disease infestations.[47] "Authorized Restoration Services" are "similar and complementary" restoration activities carried out on federal and non-federal land."[48] These are also activities "to restore or improve forest, rangeland and watershed health, including fish and wildlife habitat."[49] Forest restoration could include "timber stand improvement" and reforestation; thinning for hazardous fuels reduction; and fish and wildlife habitat improvements such as fish passage improvements or placement of structures to support avian species.[50] Both the state and federal timber projects are clearcut timber sales. It is hard to understand why the Forest Service believes this is a Good Neighbor project.

For example, a state partner under the Good Neighbor Authority can assume contracting, layout and other administrative responsibility for federal timber sales

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[44] PR 820_0050 (DOF scoping 6.7.17); 820_0062 (Maisch e-mail, 10.12.2017); 820-0138. Exh. TIM4, Division of Forestry. 2017. Board of Forestry, Draft Meeting Minutes August 1, 2017.

[45] Exh. TIM8, USDA Forest Service. 2015. Good Neighbor Timber Sales Interim Implementation Instructions Enclosure with Forest Management Director's Letter to Regional Foresters. File Code 2430. Pp. 14-15.

[46] PR 820_0221 (Gate 1 analysis).

[47] 16 U.S.C. § 2113a(a)(1), (3); Exh. TIM8 at 3.

[48] Exh. TIM8 at 4.

[49] Exh. TIM8 at 4.

[50] *Id.* at 6-7.

and use the *revenue to fund authorized restoration activities*.[51] According to the Forest Service's guidelines, the Good Neighbor Authority is primarily for watershed improvement and timber sales should not occur absent the accomplishment of watershed restoration work.[52] Projects such as the Vallenar Young-Growth Project with low timber values are poor candidates for Good Neighbor projects because program income is for the purpose of funding watershed improvements and not simply for the state to recover project development and administration costs.[53]

The State's part of the bargain here is not watershed restoration, but rather the Vallenar Bay Timber Sale and funding for state timber bureaucrats. This project may set a precedent by using the Good Neighbor Authority for a project that does not propose to implement any obvious "Authorized Restoration Services." For this reason, the use of the Good Neighbor Authority here is not within the Forest Service's statutory authority.[54]

Even more alarming is the inability of the state to prepare the timber sale and risk that some other timber agency that is even less responsible will assume contracting authority. In September 2017, the Forest Service authorized the Division of Forestry and its partners to prepare, award and administer the Kosciusko second-growth timber sale.[55] The Alaska Mental Health Trust's Land Office developed the contract and will administer the sale.[56] The delegation of state contracting authority to the "Trust" is alarming. The Trust is in complete disarray, with multiple resignations, allegations of dubious investments and violations of state law.[57] The Trust's own timberlands on Gravina Island are a mess, characterized by abandoned merchantable logs, slash and other post-extraction trash and the destruction of areas previously used for hikers and hunters.[58]

The Good Neighbor Authority anticipates that states have law enforcement ability. Also, the Preliminary EA relies on Forest Service personnel to monitor and adapt the project during implementation to address issues such as undiscovered sensitive plants. As explained by the Forest Service's guidance for Good Neighbor projects: "Where it is anticipated that the State and the Forest Service will have a regular and recurring partnership implementing Good Neighbor agreements, the participating Forest Service unit may develop local operating procedures to outline

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[51] *Id.* at 10.

[52] *Id.*

[53] *Id.* at 6.

[54] 5 U.S.C. § 706(2)(C), (D).

[55] Exh. TIM1, Bluemink, E. 2017. First Alaska timber sale sold under state-federal Good Neighbor Authority.

[56] Exh. TIM4, Division of Forestry. 2017. Board of Forestry, Draft Meeting Minutes August 1, 2017 at 5.

[57] Exh. TIM5 (Hillman, A. 2017); TIM6 (Hillman A. 2016); TIM7 (Cole 2016).

[58] PR 820_0183 (Sallee 2017).

development and implementation of future projects for consistency, expediency, and benefit of experience."[59]

In sum, state timber bureaucrats may wish to utilize the Good Neighbor Authority as another way to appropriate additional federal funds to support the Division of Forestry. The Good Neighbor Authority is not a blank appropriations bill, but rather requires the state to do something to fulfill the statutory purpose. Further NEPA analysis needs to disclose the potential use of the Good Neighbor Authority and justify its use. Also, the Forest Service will need to step back and follow appropriate procedures, such as the Gate 1 analysis and scoping.

D. The NEPA analysis should consider the cumulative effects of the timber projects together and then revisit the FONSI

Non-federal land managed by other timber agencies surrounds the recovering federal forest land in the Vallenar Creek watershed.[60] The Alaska Division of Forestry will offer a timber sale in 2018 that would remove 300 acres of recovering forest and 300 acres of old-growth timber on the west side of the project area.[61] The University of Alaska plans to clearcut 1,309 acres adjacent to the Division of Forestry's proposed timber sale on the southwest side of Vallenar Bay.[62] The Alaska Mental Health Trust will receive 3,180 acres of land on the east side of the Vallenar Creek Watershed.[63]

The Vallenar project, as coordinated with the State and University projects, will entail significant cumulative effects that require the Forest Service to at a minimum redo its cumulative effects analyses and then re-evaluate whether to prepare an EIS. The FONSI ignored direct and indirect effects to project area resources and the coordinated multi-agency project in stating that "[i]n order to have a cumulative effect there must be a direct or indirect effect to a resource by the Proposed Action."[64] It then wrongly determined that there would be cumulative impacts but those impacts would not be significant.[65]

The determination of a significant effect on the environment requires consideration of "intensity."[66] Intensity is the degree to which the agency action affects the locale and interests identified in the context part of the inquiry.[67] A project's intensity requires evaluation of various factors, including "[w]hether the

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[59] Exh. TIM8 at 9

[60] Preliminary EA at 6, Fig. 3.

[61] *Id.* at 5, Table 1. The state project will log old-growth forest along the beach fringe from Vallenar Bay to Vallenar Point on the north end of Gravina Island, recovering forest on the east side of the Vallenar Creek watershed and old-growth forest on the west side of the Vallenar Creek watershed. PR 820_0151 (map).

[62] Preliminary EA at 5, Table 1, 7.

[63] *Id.* at 5, Table 1.

[64] Preliminary EA at 19.

[65] *Id.*

[66] 40 C.F.R. § 1508.27.

[67] *National Parks & Conservation Ass'n v. Babbitt*, 241 F.3d 222, 731 (9th Cir. 2001).

action is related to other actions with individually insignificant but cumulatively significant impacts[.]"[68] For purposes of determining whether to prepare an EIS, "[s]ignificance cannot be avoided by terming an action temporary or by breaking it down into small component parts."[69] A cumulative impacts analysis "requires 'some quantified or detailed information" and "must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects."[70]

There is considerable inconsistency with how the NEPA analysis addresses cumulative effects. The Preliminary EA considered non-federal impacts on sensitive plants, and the applicable resource report considered "historic, current and foreseeable future activities on Gravina Island."[71] The analysis of cumulative impacts for timber economics states that "the Proposed Action, when combined with the University of Alaska and the State of Alaska timber sales, would have beneficial cumulative effects in terms of annualized jobs.[72]

Thus, the Preliminary EA considered the multi-agency project as one for the purpose of assessing cumulative impacts to Alcan's business interest. But it then evaluates aquatic and wildlife habitat in a vacuum, as if the partner sales did not exist. For example, the discussion of cumulative impacts to aquatic habitat considers only the federal component of the project by relying on federal stream buffers and narrowing the scale of peak flow impacts to the federal project.[73] It then reached the untenable conclusion that "no ... cumulative impacts to fish species are anticipated" despite planned clearcutting of over 1,900 acres.

Also, the Preliminary EA asserts that "[b]ecause there are no measurable direct or indirect effects to ... Sitka Black-tailed deer, there would be no cumulative effects from the Proposed Action."[74] The wildlife biologist relied on the absence of old-growth extraction in reaching this conclusion, and never considered the cumulative consequence of condemning 2,000 neighboring acres of forested habitat to long-term stem-exclusion "forest."[75] Further, because of the need to retain connectivity between high-elevation areas and the valley, the NEPA analysis will have to consider the multiple projects together.[76]

As explained by the Supreme Court, under NEPA, "proposals for ... actions that will have cumulative or synergistic environmental impact upon a region ... pending concurrently before an agency ... must be considered together. Only through comprehensive consideration of pending proposals can the agency evaluate different

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[68] 40 C.F.R. § 1508.27(b)(7).

[69] *Id.*

[70] *Klamath-Siskiyou Wildlands Center v. BLM,* 387 F.3d 989, 993-94 (9th Cir. 2004)(citations omitted).

[71] *Id.* at 10; PR 820_0025, 0026.

[72] Preliminary EA at 12.

[73] *Id.* at 13.

[74] *Id.* at 16.

[75] PR 820_0085 (e-mail 11.6.17; draft language).

[76] PR 820_0050 (DOF Scoping 6.17.17).

courses of action."[77] Timber agencies must consider the cumulative impacts of pending removals of millions of board feet of timber from other activities.[78] The need for a detailed cumulative effects analysis is even more compelling when the impact of future development is greater than the impact of the analyzed project itself, and *"the potential for … serious cumulative impacts is apparent."* [79] In light of the clear spatial, temporal, financial and administrative connections between the Vallenar Project and adjacent timber projects, the NEPA analysis must provide a comprehensive analysis of adverse cumulative environmental impacts.

Further NEPA analysis for this project must carefully address the critical issue of what cumulative effects will occur, and also consider the additional amount of recovering forest that private landowners would prevent from fully recovering to the attainment of old-growth characteristics. The potential for serious cumulative impacts arising from federal and non-federal logging is apparent. This project is very similar to the pending Kosciusko Island logging project in that "[a]djacent state, Alaska Mental Health Trust and University of Alaska clearcuts would result in a "high likelihood that substantial changes to forest structure would occur in the project area as a result of cumulative large-scale State and private timber harvest within the next 10 years."[80] As the Forest Service noted in the NEPA analysis for that project, lands owned by four timber agencies (here, University, State, Forest Service and Trust] have the potential "to essentially coalesce into one expanse of homogenous stand structure," resulting in a scarcity of advanced forest structure over a large portion of the project area.[81]

The potential for serious cumulative impacts here is readily apparent, and the Preliminary EA and FONSI need considerable revision.

III. The analysis in the Preliminary EA is inadequate to support the FONSI

The purpose of an EA is to evaluate whether to prepare an EIS or a Finding of No Significant Impact (FONSI). A FONSI that relies on a flawed EA violates NEPA.[82] The Preliminary EA is a thin document that provides an introduction, two map pages, a ten page discussion of environmental impacts to seven selected resources (vegetation, invasive plants, botany, soils, timber economics, aquatic resources and wildlife) and concludes with a three page FONSI.

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[77] *Kleppe v. Sierra Club,* 427 U.S. 390, 410 (1976).

[78] *Blue Mountains Biodiversity Project,* 161 F.3d at 1251; *Klamath Siskiyou Wildlands v. BLM,* 387 F.3d 989, 994-95 (9th Cir. 2004)

[79] *Te-Moak Tribe v. U.S. DOI,* 608 F.3d 592, 605-606 (9th Cir. 2010)(emphasis added).

[80] US Forest Service. 2015. Kosciusko Vegetation Management and Watershed Improvement Environmental Assessment at 38.

[81] *Id.*

[82] *Native Ecosystems Council v. Tidwell,* 599 F.3d 926, 936-937 (9th Cir. 2010).

A. Wildlife: The NEPA analysis of impacts to deer requires significant revision

There has been a longstanding concern about the long-term sustainability of deer populations on Gravina Island.[83] Gravina Island has a low deer population due to a combination of the natural terrain (very little deer summer range, so deer are on winter range all year) and past loss of old-growth forest to logging.[84] Some of the remaining deer currently utilize the project area, particularly lower elevation portions of the stand for foraging.[85] The Vallenar Creek area is also important to maintaining wildlife movement opportunities.[86] Much of the best deer habitat on the island is in the coastal fringes and creek drainages – i.e. the University of Alaska and Division of Forestry lands that are part of this project.[87] Our previous scoping comments thus requested that because adjacent land owners are planning high intensity commercial timber extraction, the Forest Service should consider retaining public forested land as refugia for deer – both to avoid immediate displacement and over time to allow for the eventual succession of old-growth forest characteristics.

1. The Preliminary EA failed to take a hard look at impacts to deer and to provide adequate analysis of forest succession for the no-action alternative

NEPA requires agencies to consider alternatives to proposed actions when a project may "involve [] unresolved conflicts concerning alternative uses of available resources."[88] Agency decisionmakers must "[have] before [them] and take[] into proper account all possible approaches to a particular project *(including total abandonment of the project)* which would alter the environmental impact and the cost benefit balance."[89] Agencies must also "rigorously explore and objectively evaluate all reasonable alternatives" in a way that allows the public to evaluate the comparative merits of each alternative.[90] The key criterion is whether the "selection and discussion of alternatives fosters informed decision making and informed public participation."[91] The Preliminary EA never squarely considers the value of the no-action alternative in terms of the value of allowing the forest succession process to occur so that public forests will eventually develop old-growth habitat characteristics.

The State of Alaska has found that some of the second growth timber along Vallenar Creek "has matured and now provides a mix of characteristics that may be beneficial to deer" such as travel cover and some winter habitat value and that

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[83] PR 820_0023 (ADF & G. 2002. Gravina Island Timber Sale Final ACMP Finding); Exh. WL 8 at 1-5 (Porter 2015)(identifying Gravina Island as an "area of concern").

[84] Comments and appeal on the state's Vallenar Bay sale; ADF&G's Gravina IM report; ADF&G (2002, Ingle); documents on the University of Alaska's timber sale.

[85] PR 820_0023 at 9.

[86] PR 820_0024 at 15.

[87] PR 820_0024 at 15; Exh. WL 3 (Alaback et al. 2014).

[88] 42 U.S.C. § 4332(2)(E)

[89] *Calvert Cliffs' Coordinating Committee, Inc. v. U.S. Atomic Energy Commission,* 449 F.2d 1109, 1114 (D.C. Cir. 1971)(emphasis added).

[90] 40 C.F.R. § 1502.14 (emphasis added).

[91] *Westlands Water Dist. v. U.S. Department of Interior,* 376 F.3d 853, 872 (9th Cir. 2004).

"second growth timber not harvested typically slowly develops characteristics that offer cover habitat and will mature over time to provide understory food for the deer."[92] The Forest Service's silviculturist is also finding stands reaching the understory initiation stage earlier than age 150.[93]

The forest vegetation report shows how the NEPA analysis failed to meaningfully evaluate the no-action alternative: it identifies no direct effects, and states that "indirect effects from this alternative would be the lost opportunity to create a new early seral stand structure from rotational harvest. The stand will continue to develop through the stem exclusion phase and eventually enter into the understory phase of development barring any catastrophic disturbance event."[94]

The wildlife resource report identifies a positive effect to deer: "forage habitat would increase in the years following harvest, thereby providing a beneficial effect."[95] The wildlife biologist actually identified the no-action alternative as having negative effects to deer because the habitat would remain in stem exclusion for an extended period of time.[96] There is no indication that the wildlife biologist understood the forest succession process or that this project would delay the recovery to old-growth habitat.

There are four stages of forest succession in previously clearcut southeast Alaska forests: (1) stand initiation (1 – 25 years): (2) stem exclusion (25 – 150 years); (3) understory reinitiation (150 – 250 years); and old-growth forest (>250 years).[97] Many older second-growth stands in biogeographic provinces with high levels of past old-growth logging would recover fully into the understory re-initiation stage over the next 40 to 50 years. However, the Vallenar project would delay this recovery process so that clearcut second-growth forests would require 60 years to reach the same stand conditions present today, and as much as another century to recover into understory re-initiation structure.

As explained to the Forest Service during the 2016 Forest Plan Amendment process, setting succession back to its earliest stage will not advance old growth conditions and not be beneficial for any resource other than Alcan's timber interests in the long-term.[98] The proposed short rotation will never meet the need to provide long-term understory forage production and habitat quality for wildlife. One of the most important and early reviews of forest succession in southeast Alaska noted that "there are no data at this time to suggest that ... *timber rotations less than 200 years* will measurably increase either the diversity or productivity of understory vegetation over that typically found in old-growth forests."[99] Given this impact, particularly in

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[92] PR 820_0024 at 15. State of Alaska. 2015. Final Best Interest Finding and Decision for Vallenar Bay Timber Sale Number SSE-1345K.

[93] PR 820_0047.

[94] PR 820_0046.

[95] PR 820_0023 at 9; PR 0085.

[96] PR 820_0085 (e-mail 11.6.17).

[97] Exh. WL 1 at 5-8 (Alaback 1984).

[98] Exh. WL 6 (Kirchhoff 2015).

[99] Exh. WL 1 at 3 (Alaback 1984).

light of planned logging by other timber agencies in the same watershed, it was unreasonable to forgo a detailed analysis of the risk of creating a long-term habitat deficit:

> In Southeast Alaska there are many specific ecological factors which explain why logging can have such a negative impact on key wildlife species in this region. Most logging has occurred in low-elevation valley bottoms (<1000') which provide critical habitat for wildlife, especially during times of heavy snow cover. Removal of old-growth forest and its replacement by second-growth forest affects winter habitat for deer in two specific ways: loss of snow shedding capability of complex old-growth canopies (effects mobility and foraging efficiency of deer) and loss of a productive understory plant community (provides forage quality and quantity). Although clearcut harvesting does produce an immediate flush of high quality understory biomass, it typically lasts only 10-25 years, and is not available to deer during periods of heavy snow. The greatest impact occurs three or more decades after logging, during the "stem exclusion" phase of forest stand development, when the densely stocked and rapidly growing young conifers shade out most of the important plant species for deer and other wildlife species. The stem exclusion phase lasts for as much as 150-200 years so can create a long-lasting deficit of wildlife habitat for a given watershed or region, unless an *effective* restoration strategy can be developed.[100]

Defenders submits that maintaining successional forests in the stem exclusion phase in areas with an existing and increasing old-growth habitat deficit is a significant problem. Scientists involved in the development of the TLMP conservation strategy recognized that short rotations as proposed here are "insufficient for development of forest stand attributes approximating the composition, structure, and function of old-growth forests."[101] Thus, even-aged short rotations had "the highest level of risk for old-growth associated wildlife species."[102]

Remarkably, there is no indication in the record or analysis that the Forest Service ever considered that the Forest Service's partners in the project will develop hundreds of acres of newly clearcut "forage habitat" in adjacent lands. Further NEPA analysis must evaluate the Forest Service's perceived need to create "forage habitat" and balance that need against the long-term old-growth habitat deficit caused by delaying the forest succession process.

The decision to delay the forest succession process in older recovering forests in the Vallenar Creek Watershed entails possible effects on the human environment, which are highly uncertain and involve unknown risks.[103] Further NEPA analysis

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[100] Exh. WL 2 (Alaback 2010).

[101] Exh. WL 4 at 6 (Iverson et al. 1996).

[102] Exh. WL 4 at 7 (Iverson et al. 1996).

[103] 40 C.F.R. §1508.27(b)(5); *see also Native Ecosystems v. U.S. Forest Service,* 428 F.3d 1233, 1240-41 (9th Cir. 2005).

must provide a more thorough discussion of the no-action alternative in terms of the benefits of allowing the forest succession process to occur. It must also revisit the FONSI's conclusion, which relies on a flawed analysis for the assumption that there are no risks to deer.[104]

2. The Preliminary EA failed to take a hard look at direct and indirect effects to deer and the value of the no-action alternative

The analysis of impacts to management indicator species such as deer identifies "negligible" direct and indirect effects to deer because the project (in isolation) would not remove old-growth habitat.[105] Because of the importance of the Vallenar watershed to deer and precarious condition of Gravina Island's deer population, displacement caused by logging activities and impairment to travel corridors are much more than "negligible." State of Alaska old growth and young-growth harvest will cause "a decrease in the deer population in the immediate area of the harvest" and lower deer carrying capacity.[106] Further NEPA analysis should provide a more detailed discussion of the following concerns:

(1) Identify and map wildlife corridors - the wildlife resource analysis identifies a reduction in the important connection between high elevation habitat on California Ridge and low-elevation habitat near Vallenar Creek.[107] The NEPA analysis should include a map of these deer travel corridors in order to fully assess project impacts to wildlife.[108]

Also, the Forest Service intends to maintain connectivity through three leave strips.[109] The record indicates in numerous places that leave strips are at risk of being blown down. The Forest Service refused to buffer sensitive plants because Vallenar valley windstorms would likely unravel the trees.[110] Trees remaining after the Heceta commercial thin project blew down and made a mess.[111] The Forest Service is clearcutting these recovering forests primarily because of windthrow risks.[112] The analysis needs to reconcile the inconsistency between the reliance on leave strips for deer and the rationale for clearcutting and refusal to buffer sensitive plants which assumes second-growth forests will blow down.

(2) Assess effects to deer and deer predators based on changes in access - the State of Alaska notes that "[a] notable change in the project area will be in the improved ability of predators (human, wolf and bear) to access deer in the project

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[104] Preliminary EA at 19.

[105] PR 820_0023 at 9 (adding that "forage habitat would increase in the years following harvest, thereby providing a beneficial effect").

[106] PR 820_0024 at 16 (Vallenar BIF)

[107] PR 820_0023 at 9.

[108] PR 820_0024 at 15-16 (Vallenar BIF).

[109] PR820_198 at 20.

[110] PR 820_0210.

[111] PR 820_0057 (Tongass Transition Collaborative).

[112] PR 820_0194; Preliminary EA at 8.

area."[113] Logging related habitat changes and increased hunting pressure caused by changes in access patterns cumulatively will reduce the availability of deer to predators over time.[114] There is significant interplay between the deer deficit on Gravina and increased hunting effort on Prince of Wales Island.[115] Because of past and ongoing logging, the Alaska Department of Fish and Game anticipates declines in deer abundance and hunter harvest, causing increased pressure on Prince of Wales Island deer populations.[116]

(3) Assess Gravina Island deer habitat capability using the deer model with modifications relevant to the island's habitat condition. Nowhere does the Preliminary EA or record show any effort to appropriately utilize a deer model specific to the island.[117]

3. Conclusion

The Preliminary EA's analysis of direct, indirect and cumulative effects to deer is inadequate, and invalidates the FONSI. Further NEPA analysis must address the benefits of the no-action alternative in terms of the best available on forest succession and Sitka black-tailed deer, and provide more detailed discussion of travel corridors, access changes, and habitat capability. Because there are significant issues involving access to deer on the southern Tongass, further NEPA analysis should consider impacts to subsistence deer users on a broader scale.

B. The Botany discussion needs significant improvement

The Preliminary EA provides a two paragraph discussion of invasive plants that recognizes the potential for direct effects from road reconditioning and timber harvest and potential for spreading into vulnerable habitats such as stream corridors and wetlands.[118] There are already invasive species along portions of the new State road, creating the potential for increased spread of reed canary grass, "highly invasive" species.[119] The analysis relied on Forest Service BMPs for mitigation, resulting in a "low overall risk."[120] This conclusion changed during the development of the analysis because the agency initially identified a low to moderate risk based on the nature of reed canarygrass and state road connection.[121] But the major risk is connection with the state road with connects the Vallenar watershed with city of Ketchikan and its large spread of invasive plants.[122] How then can the Forest Service ensure that the cumulative impacts of the multi-agency project presents low risks when the risk

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[113] PR 820_0024 at 17 (Vallenar BIF).

[114] *Id.*

[115] Exhs. WL 5, 7, 8 (Porter 2015).

[116] Exh. 8 at 1-6 (Porter 2015).

[117] See e.g. PR 820_0009.

[118] Preliminary EA at 9.

[119] PR 820_0197.

[120] Preliminary EA at 9.

[121] PR 820_0025.

[122] *Id.*.

relies on measures utilized by the state? Indeed, the record indicates that the Forest Service will not require vehicles working on non-federal lands to comply with federal BMPs.[123] The Forest Service would decrease the risk over the long-term with road closures – a measure that may be too late to address a "highly invasive" species.[124]

The Preliminary EA should thus disclose the Forest Service's plans for addressing invasive weeds entering federal lands after exposure to the state road and adjacent lands. The Forest Service believes that using non-herbicidal treatments "may not effectively reduce the establishment and spread of invasive plant populations," requiring the agency to increase chemical exposure to humans, wildlife, aquatic and other resources.[125] The use of herbicides is a serious human rights issue because the Forest Service would authorize non-consensual exposure to chemical invasions of the body – compromising human health, particularly for children and pregnant women.[126] Herbicide use also has significant impacts on juvenile salmon, affecting growth and survival and ultimately the productivity of aquatic ecosystems.[127] The Preliminary EA should disclose whether or not the Forest Service plans to endanger human and aquatic health through the use of herbicides.

Defenders also has concerns about the analysis of impacts to a Forest Service sensitive plant, *plantathera orbiculata,* or the round-leaved orchid.[128] There are two occurrences of the round-leaf orchid likely to be crushed, uprooted, trampled or buried as a result of this project.[129] Most of the known occurrences are on the Ketchikan/Misty Fjords Ranger District and it is easy to mistake the round-leaved orchid for other species.[130] The record does not show that the Forest Service adequately considered the rarity of the species or its own Conservation Assessment for the species for the NEPA analysis. The Forest Service used a risk assessment instead of conducting an adequate survey, but the record does not provide anything entitled "risk assessment."[131]

Initially, the Forest Service anticipated a "moderate risk" of adverse effects to plants within the project area even with a 160-foot project specific buffer placed around known plants.[132] Analyses identified a "high" likelihood of adverse impacts that changed to "minimal direct effects" in the Preliminary EA.[133] But then the Forest Service determined there were populations elsewhere on Gravina Island, causing a

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[123] PR 820_0197.

[124] PR 820_0025.

[125] Forest Service. 2017. Prince of Wales Landscape Level Analysis Issues and Alternatives.

[126] Exh. BOT3. Beyond Toxics. 2013. Oregon's Industrial Forests and Herbicide Use: A Case Study of Risk to People, Drinking Water and Salmon.

[127] *See id.* Appx. E.

[128] This plant, *plantathera orbiculata*, is actually the "round-leaved orchid" not round-leaf orchid as described in the Preliminary EA and record material.

[129] PR 820_0210 at 1.

[130] Exh. BOT1 (Stensvold 2006); BOT2 (Dillman 2008).

[131] PR 820_0196 at 9 (EA draft).

[132] PR 820_0025; PR 820_0196 at 9.

[133] *Cf.* Preliminary EA at 10; PR 820_0210.

change in the cumulative effects determination to "low risk" and decision to eliminate the buffer.[134] The Forest Plan directs the agency to consider various ways of protecting a sensitive plant population from project impacts.[135] The Plan does not specify that the presence of other plants somewhere else obviates the need to protect plants where found.

The biological evaluation assumes that non-development lands on Gravina Island adequately protect habitat for other populations, and that diligent Forest Service personnel would implement project-specific measures to protect plants when found.[136] Again, there is considerable inconsistency in the analysis. The Forest Service has already scrapped buffers for existing populations in favor of having Alcan crush, trample or uproot them. It is unclear whether this purported mitigation measure would be effective in any way – particularly because it would rely on Alcan's loggers to identify the plant correctly before trampling, crushing or uprooting it.

The decision to eliminate plant buffers and at the same time change the risk effects determination is troubling. Further NEPA analysis should provide more detailed information about surveys elsewhere on Gravina Island and map the results.

C. The Preliminary EA needs to provide a more thorough analysis of other identified resource issues

1. Timber Economics

As previously discussed in our comments on the Purpose and Need for the project, the discussion of job and references to skills in the Timber Economics section of the Preliminary EA are confusing. For example, the Preliminary EA identifies an "opportunity ... to develop new skills and increase local knowledge of harvest methods for young-growth timber."[137] But the timber resource report identifies an "experienced" workforce.[138] And the Preliminary EA assumes ground-based yarding and felling by chainsaw.[139] Why would an experienced logger need to refine skills in felling trees?

Also there are several inconsistencies between the reports and discussions in the record and the Preliminary EA. The timber resource report, for example, assumes that Alcan would use a feller-buncher for most of the logging except on steep slopes.[140] The function of a feller-buncher is to minimize the need for loggers.[141] The Preliminary EA identifies 10 logging jobs based on felling by chainsaw.[142] Thus the Preliminary EA likely overestimates jobs and direct income.

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[134] PR 820_0163.

[135] 2016 Tongass LRMP at 4-39.

[136] PR 820_0210 at 2; PR 820_0125.

[137] Preliminary EA at 11.

[138] PR 820_0218.

[139] Preliminary EA at 11.

[140] PR 820_0218 at 1.

[141] Exh. TIM12 at 2-3 (D. Alaska 2013).

[142] Preliminary EA at 12.

Further, the Preliminary EA identifies those imaginary 10 logging jobs and 7 transportation jobs as providing direct income of $1,029,574.00.[143] But the most updated FASTR model run in the record, however, projects $679,945.00 in direct income.[144] The latter figure seems more realistic – is Alcan really going to pay 17 workers a million dollars when a single logger operating a feller-buncher can lay 4 acres to waste in a single day and complete the project in four to six weeks?

The Preliminary EA identifies Forest Service administrative costs of $255,186.00 for sale preparation, sale administration, and engineering support.[145] But road costs will exceed $300,000 per mile. NFS road 8110000 requires blocking with a new rock overlay, and full replacement of culverts.[146] The existing road is in poor condition, with a number of encroaching landslides and is likely to break down under traffic, producing large amounts of sediment.[147] Extensive work will be needed to clean and grub, remove landslides, place drainage structures, and recondition and rehabilitate the road.[148] There is also uncertainty about funding for future maintenance of the road.[149] The NEPA analysis should disclose whether or not federal taxpayer will provide this windfall to Alcan. The state of Alaska, for example, provided some of the subsidy needed to make the project feasible for Alcan.[150] It is hard to believe that Alcan would spend $300,000 to purchase a timber sale with an estimated bid value of $213,000.[151]

2. Windthrow and landslide risks undermine the Preliminary EA's conclusions regarding impacts to fisheries

The Vallenar Creek Watershed encompasses 3,892 acres with 24 stream miles and 13 miles of Class I and Class II streams; the project area contains eight miles of streams overall with three miles of anadromous streams.[152] The Vallenar Creek watershed has an extensive network of Class 3 and 4 streams that drain into the larger watershed.[153] The Preliminary EA determination that there would be no direct, indirect or cumulative impacts to fish species lacks support in the record.[154]

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[143] *Id.*

[144] *Cf* PR 820_0218 at 3 (9/20/17 FASTR model run); PR 820_0215 (9/3/2017 FASTR model run).

[145] Preliminary EA at 12.

[146] 820_0050 (DOF scoping 6.7.17).

[147] PR 820_0222.

[148] PR 820_0222 (identifying costs of $60,000 to replace 6 culverts per mile at 10k each; $30,000 cost to remove four landslides; $191,600 cost for clearing, grubbing, reconditioning, overlay, and rehab and $12,000 for mobilization).

[149] 820_0050 (DOF scoping 6.7.17).

[150] PR 820_0218 at 4 (explaining that state construction of 1.2 miles of the road prior to this project would decrease Alcan's costs by $154,418,50 and substantially increase the advertised bid rate).

[151] Preliminary EA at 12; PR 820_0218 at 2 (resource report sale value $213,342.00.

[152] Preliminary EA at 12.

[153] PR 810_0154 (map).

[154] Preliminary EA at 13.

There are significant windthrow-associated risks to streams. For example, Forest Service staff struggled with how to mitigate risks to streams through modified buffers.[155] All of the considered options were likely to harm stream integrity rather than provide protection because the buffer would blow out, blocking flow, creating debris jams and affecting bank stability.[156] Also, existing project area hillsides are already destabilized by previous logging.[157] Finally, the Preliminary EA does not discuss the significance of Class III and IV streams to water quality – an issue of particular importance given the significant proportion of overall stream mileage.

3. Will windthrow make this a massive, 100+ acre clearcut?

The FONSI states that:

> "[t]he Forest Service has considerable experience with the types of activities like those in the Proposed Action, which are reasonably predictable and well understood. None of the activities in the Proposed Action are new or unique. Based on the analysis ... the possible effects on the human environment are not highly uncertain and do not involve unique or unknown risks."[158] The Tongass National Forest has developed only five young-growth timber projects and believes that additional experience and learning is necessary for the Forest Service and partner timber agencies to evaluate this "emerging resource."[159]

The record suggests otherwise – according to the local chapter of the Society of American Foresters - the Dargon Point second growth timber sale on Prince of Wales Island was a failure as a small mill and subsequently Alcan failed to execute on it, and the Heceta project unraveled.[160] According to the Tongass Transition Collaborative, the Heceta project could not withstand winter winds, and anything less than clearcutting destroys the remaining stand.[161] A particular concern then is whether the adjoining cutting units may become one single clearcut as the small no-harvest areas blow down. The NEPA analysis needs to acknowledge that this project is an experiment, and the Forest Service's limited experience in removing recovering forests carries a high risk of losing whatever buffers left in between smaller clearcuts to blowdown.

IV. Conclusion

For the above reasons, Defenders requests that you cease planning on this project.

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[155] PR 820_0176 (meeting notes).

[156] PR 820_0176.

[157] Preliminary EA at 11; PR 820_0183 (Sallee 2017).

[158] Preliminary EA at 19.

[159] PR 820_0196 (draft PEA).

[160] PR 820_0187.

[161] PR 820_0057.

add sig.

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List of Exhibits

Exh. BOT1 Stensvold_2006__Report,.pdf

Exh. BOT2 Conservation Assessment PLOR4.pdf

Exh. BOT3 FINAL_Report_OregonIndustrialForest_and_HerbicideUse_12-17-13.pdf

Exh. TIM1 Bluemink 2017.pdf

Exh. TIM2 KDN 2017.pdf

Exh. TIM3 USFS DOF 2015.pdf

Exh. TIM4 BOF Minutes 2017 August 1 DRAFT.pdf

Exh. TIM5 Hillman 2017.pdf

Exh. TIM6 Hillman 2016.pdf

Exh. TIM7 Cole 2016.pdf

Exh. TIM8 GNA Initial Implementation Instructions__Directive__6Jul2015.pdf

Exh. TIM9 Tongass Young Growth Symposium 2_Briefing_Sept 2016.pdf

Exh. TIM10 Progress Toward Achieving Tongass Advisory Committee Recommendations_May 2017.pdf

Exh. TIM12 D. Alaska 2013.pdf

Exh. WL 1 Alaback 1984.pdf

Exh. WL 2 Alaback 2010.pdf

Exh. WL 3 Alaback et al 2014.pdf

Exh. WL 4 Iverson 1996.pdf

Exh. WL 5 deer_smr_2015_3_chapter_4_unit_2.pdf

Exh. WL 6 Kirchhoff_2015__19-April letter to the TAC.pdf

Exh. WL 7 searac_fall2017_meeting_book_small.pdf

Exh. WL 8 deer_smr_2015_3_chapter_1_unit_1a.pdf